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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHANE GALITSKI, RICHARD
TALIAFERRO and BRIAN
NEWBOLD, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

SAMSUNG
TELECOMMUNICATIONS,
AMERICA, LLC, a New York
corporation,

Defendant.

CASE NO. 8:CV-12-00903-CJC (JRPx)

**STIPULATION RE RELIEF FROM
LOCAL RULE 23-3**

Pursuant to Local Rule 8-3, Plaintiffs Shane Galitski, Richard Taliaferro and Brian Newbold, individually and on behalf of all others similarly situated (collectively “Plaintiffs”) and Defendant Samsung Telecommunications America, LLC (“Defendant”), by and through their attorneys of record, hereby agree and stipulate that Plaintiffs be

1 relieved of the requirement in Local Rule 23-3 of filing a class certification motion within
2 90 days of service of the complaint, and that the deadline for filing Plaintiffs' class
3 certification motion be set by the Court at the Rule 26 scheduling conference.
4

5 Plaintiffs filed a Class Action Complaint on June 6, 2012. The parties have agreed
6 to extend Defendant's response date to Plaintiff's initial Class Action Complaint to
7 August 2, 2012. Local Rule 23-3 requires that Plaintiff file a motion for class certification
8 within 90 days after service of the class action complaint, or by September 5, 2012, unless
9 otherwise ordered by the Court.
10

11 The parties mutually request that Plaintiffs be relieved of the requirement of Local
12 Rule 23-3, of filing a class certification motion within 90 days of service of the complaint,
13 and that the deadline for filing Plaintiff's class certification motion be set by the Court at
14 the Rule 26 scheduling conference. The parties mutually agree to have a proposed class
15 certification schedule prepared before the Rule 26 scheduling conference.
16

17
18 IT IS SO STIPULATED.
19

20 DATE: July 24, 2012

Respectfully submitted,

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1 Dated: July 24, 2012

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L.L.C.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record in accordance with the FEDERAL RULES OF CIVIL PROCEDURE on **July 24, 2012**.

VIA ECF

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